

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re Application of Makhpal Karibzhanova  
for Judicial Assistance Pursuant to  
28 U.S.C. § 1782*

Case No. 21-mc-00442-KPF

**NOTICE OF MOTION OF NON-PARTY VLADISLAV KIM TO INTERVENE AND  
MODIFY BANK SUBPOENAS AND FOR PROTECTIVE ORDER**

**PLEASE TAKE NOTICE** that upon the Affidavit of Vladislav Kim (“*Kim*”), dated September 3, 2021, and the accompanying Memorandum of Law, Kim, through his counsel Baker & McKenzie LLP, will move this Court before the Honorable Katherine Polk Failla, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an order permitting Kim to intervene in this action pursuant to Federal Rule of Civil Procedure 24, modify the subpoenas issued by John W. Moscow pursuant to Rule 45, granting a protective order pursuant to Rule 26, and for such further and other relief as the Court may deem just and proper.

Dated: New York, New York  
September 7, 2021

Respectfully submitted,

/s/ L Andrew S. Riccio

L Andrew S. Riccio

Terence Gilroy

**BAKER & MCKENZIE LLP**

425 Fifth Avenue

New York, New York 10018

(212) 626-4100

Andrew.Riccio@bakermckenzie.com

Terence.Gilroy@bakermckenzie.com

*Attorneys for Vladislav Kim*